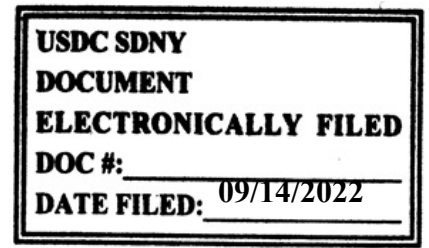


LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792-0048 • E: Jason@levinepstein.com

Via Electronic Filing

The Honorable Katherine H. Parker, U.S.M.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *Rene v. 31 East 21 Express Inc.*
Case No.: 1:21-cv-07435-JGK

MEMO ENDORSED

Dear Honorable Magistrate Judge Parker:

This law firm represents Defendant Pun San Laan Inc. (the “Defendant”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practices Rules I(b) and (I)(c), this letter respectfully serves as a request to adjourn the in-person¹ settlement conference currently scheduled for September 21, 2022 to one of the following proposed dates and times:

1. October 10, 2022;
2. October 11, 2022;
3. October 19, 2022;
4. October 20, 2022;
5. October 26, 2022; or
6. October 27, 2022.

The basis of this request is that none of the recently added defendants, identified in Plaintiff’s First Amended Complaint [Dckt. No. 49] have appeared in this action. Their appearance is critical to the facilitation of a meaningful settlement conference.

A secondary, independent, basis also necessitates an adjournment of the September 21, 2022 Settlement Conference. Specifically, the parties wish to conduct additional fact discovery before appearing before Your Honor for a Settlement Conference.

A third, independent, basis also necessitates an adjournment. *To wit*, the undersigned counsel has conflicting travel obligations on September 21, 2022, and will not be available to attend the settlement conference.

If granted, this request would not affect any other previously scheduled deadlines. This request is made on consent of Plaintiff’s counsel.

We thank the Court for its attention to this matter, and are available at the Court’s convenience to answer any questions related to the foregoing.

¹ It is also respectfully requested that the Court convert the in-person settlement conference to a virtual settlement conference, in order to assist the parties in saving costs and expenses.

Respectfully submitted,

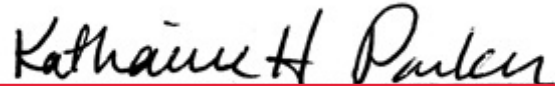
LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi
Jason Mizrahi
60 East 42nd Street, Suite 4700
New York, NY 10165
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Defendants

VIA ECF: All Counsel

APPLICATION GRANTED: The settlement conference in this matter scheduled for Wednesday, September 21, 2022 at 10:00 a.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York is hereby rescheduled to **Wednesday, November 2, 2022 at 2:00 p.m.** Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with the Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than **October 25, 2022 by 5:00 p.m.**

APPLICATION GRANTED



Hon. Katharine H. Parker, U.S.M.J.

09/14/2022